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August 26, 2021

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VIA ECF

Honorable Christian F. Hummel
U.S. Magistrate Judge
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway
Albany, New York 12207

Re: Tromblee v. State of New York, et. al.
Case No.: 1:19-CV-0638 (LEK/CFH)

Dear Judge Hummel:

I write on behalf of all Defendants, and with consent of Plaintiff's Counsel, seeking an extension of the expert disclosure deadline. Currently, the expert disclosure deadline for Defendants is August 26, 2021. *See* Dkt. 94. Plaintiff's counsel has agreed to an extension without date while we schedule the Independent Medical Examination ("IME"). The IME was previously scheduled but based on the doctor's schedule it has to be rescheduled, which we are in the process of doing.

We expect to have an agreed upon date prior to the mediation scheduled for August 28, 2021. It is the hope of counsel that we will be prepared to present new deadlines to the court at the upcoming meditation.

Accordingly, it is respectfully requested that the Court extend the disclosure deadlines without date until new dates can be presented. Thank you for your consideration in this matter.

Respectfully submitted,

HARRIS, CONWAY & DONOVAN, PLLC

s/ Ryan T. Donovan

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RTD:phb
cc.: All counsel via ECF